

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 1:19cr59
)	
DANIEL EVERETTE HALE)	

**GOVERNMENT'S NOTICE OF
SUPPLEMENTAL DEPARTMENT OF DEFENSE DECLARATION**

On March 20, 2020, the Government filed its *In Camera*, Under Seal Motion Pursuant to CIPA Section 6(a) of Objections Concerning the Use, Relevance, and Admissibility of Classified Information Noticed by Defendant Pursuant to CIPA Section 5. (Dkt. 130). In footnote 14, on page 38 of that Motion, the Government stated that the Department of Defense (DoD) was continuing to evaluate whether the information within Stipulations E, F, and H would be declassified at the time of trial. DoD has not made a determination with regard to Stipulations F and H, but has determined that Stipulation E is classified.

DoD has provided a Second Declaration, filed today with the Classified Information Security Officer ("CISO"), explaining the classification and harm to national security that would result if Stipulation E was disclosed. In this Second Declaration, DoD has also sought to clarify the specific unpublished pages of classified documents covered by its First Declaration, explained that certain redacted information is classified, and has supplemented some information

in its First Declaration. This pleading constitutes notice of the filing of the classified declaration with the CISO.

Respectfully submitted,

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By: _____ /s/

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